Appl. No.: 09/998,043
Amdt. Date: April 28, 2008
Appeal Decision date: February 28, 2008

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## REMARKS/ARGUMENTS

Please reconsider the application in view of the above amendments and following remarks. Claims 1-19 and claim 31 are pending and at issue in this application. Claims 1, 15 and 31 are independent claims. The remainder of the claims depends from independent claims 1 and 15. Applicants have added new claim 31. Applicants have canceled claims 3 and 16. This amendment is in response to the decision of the Board of Patent Appeals. Examiner and Board ruled that the Applicants' arguments for patentability were not commensurate with the scope of the claims. The Board agreed with the Examiner that the language in the independent claims did not require that the translation method be a "batch" process involving translations of text on previously created slides. Applicants have amended the claims to limit the method of the present invention to batch processing sessions. Support for the batch session limitation is found in paragraph [0041].

### Rejection of Claims

**Claims 1-6, 10-19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chou (US patent 5,583,761), in view of Applicant's admitted prior art.**

Initial review of the teachings of Chou et al.

Chou describes a method that allows application programs, performing user interfacing, to be presented/displayed in part or in whole in any language in real-time as selected by the user. In a preferred embodiment the invention comprises two processes, the Learn process and the Run process. The Learn process constructs an application specific translation table (ASTT) specifically for the target application. The Run process utilizes the ASTT during the execution of the target application and performs actual translation for the displays. Application programs can be a text-based application running in a pure text mode operating system platform. The most commonly used language for the presentation from these application programs is English.

Chou provides a method for translation of application programs such that the display information of the program can be displayed in any language desired by the user. Applicants do admit that Chou provides for the translation of information in a computing environment. However, Chou is a method which users implement as they are interfacing with a computer application program. In this approach, the output is being translated as it is being displayed to a user using the Application Specific Translation Table (ASTT). The Run process executes the target application while the language translation is being performed in parallel (Col. 3, line 5). As mentioned, this process is a real-time application that displays the translated information as it is being generated.

Initial review of Applicants' invention

Applicants' present invention provides a method and system for translating presentation slides from one language to at least one additional language. In this method, text information from one slide can be extracted from a presentation slide. Addressing information contained on the slide is also extracted from the slide. This addressing information describes the location of the text on the slide. After the text information is extract from the original presentation slide, the text is inserted into an auxiliary file for the translation procedure. This auxiliary file has a format that can be readily translated using current translation techniques. However, the addressing information is transparent and write protected to the translation program and therefore will only pass through without being translated. Following the translation procedure, the addressing information is used to insert the translated text information into a presentation slide containing any objects that existed in the original slide.

**Arguments for Patentability**

Contrasting Chou with Applicants' present invention

Applicants submit that there are similarities between Chou and the present invention. Both (Chou and Applicants' invention) translate text and use coordinates to identify the location of the string in the text. However, the Applicants' invention is a batch process that performs translations, while Chou is a real-time translation process. Further, Chou does not address the issue of non-text objects in a document. As a result, Chou does not contain steps related to distinguishing text and non-text in a document.

Another distinction is that the Chou method has a Learn process and a Run process that are not contained in Applicants' invention. The inclusion of these processes underscores the difference in the translations of Chou and Applicants' invention. The Learn process discovers from an .exe or .com file translatable text and facilitates semiautomatic translation based on a translation memory/dictionary combined with manual human translation. In the Run process, the user interface for an application (.exe or .com) running under Microsoft Windows operating system is translated on the fly (real time) into the national language of the user's choice the translation performed in the Learn Process.

There is no comparable process in Applicants' present invention to the Run process of Chou. Regarding the Learn process. Considering the Learn process is divided into two processes; (1) Extraction of human readable text requiring translation; and (2) Actual semi-automatic translation of the human readable text. There is no similarity to (2) Actual translation. However, some similarity could be claimed with the Learn process (1). Extraction of human readable text, however the scenario is quite different from the scenario in Applicants' invention, where the text resides for example in PowerPoint files and is extracted into Word files for translation and then back into the PowerPoint files.

Another distinction in the methods of implementation is that Applicants' invention is first a batch process (see paragraph [0041] of U.S. publication 2003/0101043). In Applicants' present invention, these displays are completed slides that the user desires to translate from the original language in which the slides were created into a different language. This process is not the same parallel creation and translation process described in Chou.

Argument Admission of Prior Art

The examiner also asserts that descriptions in Applicants' specification are admitted prior art. The examiner cited language in paragraph [0003] as admitted prior art. The language in the paragraph [0003] describes tools for the design and creation presentation slides. The description also mentions the display of slides in a presentation format such as a slide show presentation. Further in the discussion paragraph [0012] the

Applicants discuss the manual translation of presentation slides from one language to another and the difficulties involved in the manual processes of slide translation. Applicants submit that the general description of tools and techniques for designing and creating slides for presentation are prior art with regard to the techniques of applicants' present invention. To state that techniques exist for design and creation of a presentation does not admit that this particular technique, which is not described, is prior art. Further, the information described in Applicants' specification does not describe the translation of slides from one language to another, nor is this included in any of the Applicants' claims.

The examiner asserts Chou does not disclose the application of Chou is a presentation program for presenting slides. The examiner further implies that the existence of presentation slides and programs for creating these slides in combination with Chou makes Applicants' present invention obvious.

In order to support a prima facie case for obviousness, the cited reference must teach or suggest of each element in a claim. If there is no teaching or suggestion then there is no prima facie obvious. Chou does not teach or suggest the elements in Applicants' present invention. Chou is a method used to translate text in real time when a file/slide is being created. Applicants' present invention is used to translate (not create) text from a previously existing and completed slide. The dynamics are different because of one slide is being created and the other slide was previously created. Further, Chou incorporates a human interface in the implementation of the Chou method. Applicant's present invention is implemented as an automated batch process.

Applicants submit that contrary to the assertions of the examiner, there is no suggestion or teaching in Chou or the Applicants' specification to modify Chou to produce Applicants' present invention. If there is no teaching, there is no prima facie case for obviousness. Applicants submit that there is no prima facie obviousness in this case.

**Claims 7-9 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chou (US patent 5,583,761), in view of Applicant's admitted prior art and further in view of Rosenbaum (US patent 5,404,435).**

Initial review of Rosenbaum

In Rosenbaum non-text objects are sensed in a mixed object document to be archived in an information retrieval system. In addition to text objects, a mixed object document can contain non-text objects such as image objects, graphics objects, formatted objects, font objects, voice objects, video objects and animation objects. This enables the creation of key words, which characterize the non-text object, for incorporation in the inverted file index of the database, thereby enabling the later retrieval of either the entire document or the independent retrieval of the non-text object through the use of such key words.

Distinction between Rosenbaum and Applicants' invention

Rosenbaum does discuss identifying non-text objects in a file. However, there are two points concerning Rosenbaum, first, Rosenbaum is a document storage program. This program enables one to identify a particular image in a document independently from the document as a whole. However, Rosenbaum has nothing to do with text translation and is focused identifying and handling non-text objects. Second, contrary to the examiner's assertion, it does not appear that Rosenbaum identifies objects having multiple or sub-objects within an object in a presentation slide. A picture object may contain a text caption. The text caption, which is a separate object in the picture, would need to be translated. Rosenbaum does not address this case.

**Arguments for Patentability**

In order to support and sustain a prima facie case for obviousness, there must some teaching or suggestion to combine the references. If there is not teaching or suggestion, there is no prima facie obviousness.

In the present case, Chou (the primary reference) does not address non-text objects. Rosenbaum addresses the identification of non-text objects in the context of document storage and retrieval process. Applicants' present invention does not store and

retrieve the non-text objects, but it does identify their location on the presentation slide. Nothing in Chou teaches, mentions or even suggests non-text objects. Nothing in Rosenbaum teaches, suggests or mentions anything about translating documents from one language to a second language. Therefore nothing in the references teaches or suggests the combining of these references to produce the present invention. One reason for the lack of motivation to combine these references is that Chou focuses on translating text (text objects) and Rosenbaum focuses on the storage and retrieval of non-text objects. In fact the title of the Rosenbaum patent is Non-text object storage and retrieval.

In view of the above explanation, Applicants respectfully submit that none of the art of record (alone or in combination) teaches, discloses or even suggests the invention as recited in each of Applicant's claims. Applicant further submits that all of the pending claims are in condition for allowance. Withdrawal of the rejections and passage to issuance is respectfully requested. Applicant believes this reply to be fully responsive to all outstanding issues and place this application in condition for allowance. If this belief is incorrect, or other issues arise, do not hesitate to contact the undersigned at the below listed telephone number.

Respectfully Submitted,

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April 28, 2008